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PSC REF#:59122

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Public Service Commission of Wisconsin
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VIA FACSIMILE AND EMAIL ATTACHMENT

Mr. Edward Marion
Administrative Law Judge
Public Service Commission of Wisconsin
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

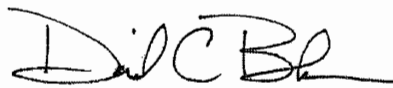
Re: Application of American Transmission Company, as an Electric Public Utility, to Construct a New Waunakee Substation and Build a New 138 kV Line from the North Madison Substation to the New Waunakee Substation in the Towns of Vienna and Westport, Dane County, WI

Docket No. 137-CE-139

Dear Judge Marion:

Enclosed for electronic filing is Sierra Club's Request for Intervention in the above-referenced docket. If you have any questions or comments about this filing, please contact me. Thank you for your attention to this matter.

Very truly yours,
GARVEY McNEIL & MCGILLIVRAY, S.C.



David C. Bender
Attorneys for Sierra Club

Encl.

cc: American Transmission Co.
c/o Lauren Azar, Esq.
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**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Application of American Transmission Company, as an Electric Public Utility, to Construct a New Waunakee Substation and Build a New 138 kV Line from the North Madison Substation to the New Waunakee Substation in the Towns of Vienna and Westport, Dane County, WI

Docket 137-CE-121

REQUEST FOR INTERVENTION BY SIERRA CLUB FOUR LAKES GROUP

Pursuant to Wis. Stats. § 227.44(2m) and Wis. Admin. Code PSC § 2.21, Sierra Club hereby requests intervention in this proceeding.

1. Sierra Club is a nonprofit organization created to protect and improve the natural and human environment, including in State of Wisconsin.

2. The Four Lakes Group of the John Muir Chapter of the Sierra Club represents Sierra Club members in the counties of Dane, Sauk, Columbia, Juneau, Adams, Richland, Iowa, Grant, Rock, Green, Crawford, Jefferson, Lafayette and Walworth. Sierra Club has over 13,000 members in the State of Wisconsin, including thousands in Dane County in the vicinity of the proposed transmission line(s) in this case. All, or almost all, Sierra Club members purchase electricity transmitted over American Transmission Company's transmission system and all will be impacted by the energy policy and route siting decisions made by the Commission in this case.

3. The Four Lakes Group and the John Muir Chapter of the Sierra Club, and its members, will be affected by the construction of the transmission line(s) at issue in this case. Specifically, Sierra Club members own property in the vicinity of the

proposed route(s), purchase electricity that is, or will be, transmitted by ATC, and generally use and enjoy the natural environment around Waunakee that will be impacted by the proposed transmission line(s). The proposed lines will negatively affect Sierra Club members.

4. Therefore Sierra Club is entitled to intervention pursuant to Wis. Stat. § 227.44 and Wis. Admin. Code § PSC 2.21(1).

5. Sierra Club's interests cannot be adequately protected by other parties. As an affected party, Sierra Club desires to participate fully as a party in this proceeding and in any request for comments or other proceedings commenced in this docket through its local group – the Four Lakes Group.

6. The Sierra Club seeks full party status to ensure there is an adequate review of the environmental impacts from the proposed facility and to propose less environmentally harmful alternatives. Therefore, intervention is also appropriate pursuant to Wis. Admin. Code § PSC 2.21(2).

7. This petition is timely, pursuant to Wis. Admin. Code § PSC 2.21(3).


8. For the aforementioned reasons, Sierra Club requests the Commission grant Sierra Club (Four Lakes Group) intervention in this proceeding.

9. Copies of all future documents and pleadings should be served upon:

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Respectfully submitted this 13th day of August, 2006.

GARVEY MCNEIL & MCGILLIVRAY, S.C.

A handwritten signature in dark ink, appearing to read "D.C. Bender", written over a horizontal line.

David C. Bender, SBN 1046102

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